

**Grayson O'Saile**

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**From:** DIANA MEY <diana\_mey@comcast.net>  
**Sent:** Tuesday, December 5, 2023 2:46 PM  
**To:** Grayson O'Saile  
**Cc:** Stuart McMillan; Gloria Traylor  
**Subject:** RE: Mey v. Liberty Home Guard // 30(b)(6) Deposition

Mr. O'Saile -

The 31st of January works for me as will holding the deposition remotely.

Thank you-  
Diana

On 12/05/2023 9:55 AM EST Grayson O'Saile <gosaille@bowlesrice.com> wrote:

Ms. Mey,

"The deposition of a corporation by its agents and officers should ordinarily be taken at its principal place of business." WRIGHT, MILLER, KANE, MARCUS & STEINMAN, FEDERAL PRACTICE AND PROCEDURE: CIVIL 2D, Section 2112 (2015 rev.); *see also Salter v. Upjohn Co.*, 593 F.2d 649, 651 (1979) ("[t]he deposition of a corporation by its agents and officers should ordinarily be taken at its principal place of business,' especially when, as in this case, the corporation is the defendant"); *Allied Security, Inc. v. Massey Energy Co.*, No. 2:08-cv-001170, 2009 WL 10689050, at \*2 (S.D.W. Va. Nov. 6, 2009).

If you want to do the deposition remotely, I would have no objection to that.

Good catch that the 28th is on a Sunday. Do you want to shoot for the 31st then?

-Grayson

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**EXHIBIT**  
**1**